

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BEVERLY L. WRIGHT,

*

Plaintiff,

*

v.

*

Civil No.: AMD-02-4181

JOHN E. POTTER,
POSTMASTER GENERAL
UNITED STATES POSTAL SERVICE,

*

*

Defendant.

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* * * * *

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff Beverly L. Wright, by her undersigned attorney, files this Consent Motion for Extension of Time and for cause states:

1. This case arises out of Plaintiff's claims of employment discrimination while employed with the United States Postal Service.
2. The Defendant has filed a Motion to Dismiss or, in the Alternative, For Summary Judgment, and a filing of a "Lengthy Exhibit".
3. Due to health problems currently in Plaintiff's counsel's family, Plaintiff's counsel has been forced to spend appreciable time out of the office.
4. Due to the foregoing circumstances, Plaintiff requests additional time to file her response to Defendant's Motions. Plaintiff seeks an additional 30 days in which to file her responses. If the Court grants this request, then Plaintiff's responses to Defendant's Motions will be due on or about September 11, 2003.
5. Pursuant to Local Rule 105.9, Defendant's counsel consents to this Extension of time.

WHEREFORE, Plaintiff prays for an Order extending the time through and including September 11, 2003 to file her response to Defendant's Motions.

Respectfully submitted,

15/

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Attorney for Plaintiff

Consented to:

Thomas M. DiBiagio
United States Attorney

By: 15/
John w. Sippel, Jr.
Assistant US Attorney
Bar No. 25484
6625 United States Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

SO ORDERED this the _____ day of _____, 2003.

United States District Court Judge